



Jerry_Goedert@URSCorp.com
11/22/2005 09:45 AM

To Sabrina Forrest/EPR/R8/USEPA/US@EPA
cc
bcc
Subject Fw: TMDL's and Standards

oops

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----- Forwarded by Jerry Goedert/Denver/URSCorp on 11/22/2005 09:42 AM

Jerry
Goedert/Denver/UR
SCorp

11/22/2005 09:43
AM

"William Simon"
<wsimon@frontier.net>

To

cc

sabrina.forrest@epa.gov, Jan
Christner/Denver/URSCorp@URSCORP
Subject
Re: TMDL's and Standards (Document
link: Jerry Goedert)

Hi Bill,

Thanks for the files. We have A72 and CC48 data thru November 2004, but would like to make projections based on as recent of data as is available.

Based on preliminary data for September, the four adit flows accounted for 41% of the total flow at CC18 and Al (54%), Cd (66 %), Cu(74%), Fe(115%), Pb(85%), Mn(89%), Zn(91%) of the load present at CC18. This compares to July where the five adits (including the Grand Mogul) accounted for 11% of the total flow at CC18 and Al (32%), Cd(41%), Cu(46%), Fe (131%), Pb (45%), Mn (50%), Zn (52%) of the load present at CC18.

Thanks again.

Jerry

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"William Simon"
<wsimon@frontier.
net>

11/21/2005 10:32
PM

"Jerry Goedert"
<jerry_goedert@urscorp.com>

To

cc

Subject

TMDL's and Standards

Jerry, I'm sending you some information related to current conditions (to 1999), stream standards, and TMDL's for the basin. You are most interested in A72 and CC48, the Animas below Silverton which is Segment 4a and Cement Creek which is Segment 7, respectively. If you look the standards up in the Regulation No. 34 book you'll notice that under Segments 4a, 3a, and 9 they refer you to Table 1 which has the adopted monthly numeric standards, whereas Seg. 8 and Cement Creek (Seg.7) only has narrative standard relating to meeting water quality at A72. Realize that meeting water quality at A72 will be the result of remediation throughout Mineral Creek and Upper Animas as well as Cement so it won't all come from just Cement Creek. What is expected for reductions, which is what the TMDL's are based upon, at CC48 is relevant and useful to you. Nevertheless, realize that CC metal concentrations have changed, for the worse I believe, after the consent decree conditions were met and the treatment plant went off line. That means we likely will want to take more out than what we anticipated even though reductions would be coming from adits not listed in our rankings (as the Red and Bonita, Gold King, and American tunnel were not previously listed). Notice that the TMDL for Mn is the same as the current condition. In other words we didn't expect to remove much Mn so whatever we get is gravy.

Was the 80% of metal load above CC 18? you talked about being from the 4 mines from high or low flow samples?

I have more information but what I've included here is likely what you need as it has loads and flows so you can extrapolate concentrations as well. Let me know if you're missing anything or if you need other data. Bill [attachment "TMDL.xls" deleted by Jerry Goedert/Denver/URSCorp] [attachment